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8
9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 CHRISTOPHER BIGGERS,

15 Defendant.

Case No. 2:21-mj-00774-EJY

**STIPULATION TO CONTINUE
PRELIMINARY HEARING**
(Second Request)

16
17 IT IS HEREBY STIPULATED AND AGREED, by and between Christopher Chiou,
18 Acting United States Attorney, and Bianca R Pucci, Assistant United States Attorney, counsel
19 for the United States of America, and Rene L. Valladares, Federal Public Defender, and
20 Benjamin F. J. Nemec, Assistant Federal Public Defender, counsel for Christopher Biggers, that
21 the Preliminary Hearing currently scheduled on November 4, 2021, be vacated and continued
22 to a date and time convenient to the Court, but no sooner than sixty (60) days.

23 This Stipulation is entered into for the following reasons:

- 24 1. Parties have entered into pre-indictment negotiations and need additional time
25 to resolve this matter.
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1 2. The government is in the process of preparing and producing discovery.
2 Counsel for the defendant will require additional time to review and investigate
3 discovery and meet with the client to discuss the details prior to proceeding.

4 2. Defendant is incarcerated and does not object to a continuance

5 3. Parties agree to the continuance.

6 4. Additionally, denial of this request for continuance could result in a
7 miscarriage of justice.

8 5. The additional time requested by this stipulation is excludable in computing
9 the time within which the defendant must be indicted and the trial herein must commence
10 pursuant to the Speedy Trial Act, 18 U.S.C. §§ 3161(b) and 3161(h)(7)(A), considering the
11 factors under 18 U.S.C. § 3161(h)(7)(B)(i) and (iv).

12 This is the second request for continuance filed herein.

13 DATED this 1st day of November 2021.

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15 RENE L. VALLADARES
16 Federal Public Defender

CHRISTOPHER CHIOU
Acting United States Attorney

17 By /s/ Benjamin F. J. Nemec

By /s/ Bianca R Pucci

18 BENJAMIN F. J. NEMEC
19 Assistant Federal Public Defender

BIANCA R PUCCI
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 CHRISTOPHER BIGGERS,

7 Defendant.
8

Case No. 2:21-mj-00774-EJY

ORDER

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10 Based on the Stipulation of counsel and good cause appearing,
11 IT IS THEREFORE ORDERED that the Preliminary Hearing currently scheduled on
12 November 4, 2021 at the hour of 4:00 p.m., be vacated and continued to January 3, 2022 at
13 the hour of 4:00 p.m., in Courtroom 3A.

14 DATED this 1st day of November 2021.

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17 UNITED STATES MAGISTRATE JUDGE
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